

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

TOSATTI PADMORE,

Defendant

)
)
)
)
)
)
)

CRIMINAL CASE NO. 12-CR-61-PB

REVISED ASSENTED TO MOTION TO CONTINUE

NOW COMES the accused, TOSATTI PADMORE, by and through counsel, and hereby moves this Court to continue his December 4, 2012 Trial for 60 days.

In support of this Motion, the defendant states as follows:

1. The accused is scheduled to appear in this Court on December 4, 2012, at 9:30 a.m. for his Trial;
2. The defendant is currently trying to resolve this matter by way of a plea agreement. Alternative plea scenarios have been discussed between the parties. The alternative scenarios revolve around whether or not the defendant, if convicted, qualifies as a career offender. The career offender issue involves an assault by prisoner conviction. The defendant requires additional time to work out these issues with the government.
3. That the defendant is aware of this motion;
6. That Attorney William Morse, Assistant U.S. Attorney, has no objection to this motion.

WHEREFORE, the defendant respectfully requests that this Court grant the within Revised Assented to Motion to Continue Trial for 60 days.

Respectfully submitted
Tosatti Padmore,
By his Attorney,

Date: November 20, 2012

/S/Paul J. Garrity
Paul J. Garrity
Bar No. 905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 20th day of November, 2012, a copy of the within was e filed to the United States Attorney's Office, parties of record and mailed, postage prepaid, to Tosatti Padmore.

/S/Paul J. Garrity
Paul J. Garrity